

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

Larry D. Smith, Jr.
a/k/a Larry D. Smith
Debtor 1

Larry D. Smith, Jr.
a/k/a Larry D. Smith

Movant(s)

v.

Lakeview Loan Servicing, LLC

Respondent(s)

Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 1:23-BK-02739-HWV

Matter: Motion to Reimpose Automatic Stay

DEBTOR(S)' MOTION TO REIMPOSE AUTOMATIC STAY

AND NOW, come the Debtor(s), Larry D. Smith, Jr., through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Motion to Reimpose Automatic Stay and aver as follows:

1. Debtor(s) filed a voluntary Chapter 13 Petition and Plan on or about December 1, 2023. Debtor(s)' First Amended was confirmed by Order of Court dated April 10, 2024.
2. At the time of filing, Debtor(s) were indebted to Lakeview Loan Servicing, LLC ("Respondent(s)") for Debtor(s)' personal residence located at 14731 Trout School Road, Felton, York County, Pennsylvania.
3. On or about July 25, 2024, Respondent(s) filed a Motion for Relief from the Automatic Stay (the "Motion"), alleging that Debtor(s) had not made post-petition payments and a hearing was subsequently scheduled for August 20, 2024.
4. On or about July 26, 2024, Debtor(s) filed an answer to the Motion alleging that Debtor(s) stood ready to bring their account current with Respondent(s) under terms agreeable to the parties.
5. On or about September 25, 2024 this Honorable Court entered an Order approving the Stipulation which was filed on or about September 25, 2024.
6. On or about January 14, 2025, Respondent(s) filed a Certificate of Default for Debtor(s)' failure to bring their account current per the stipulation terms, and an Order granting the Motion was entered on January 15, 2025 lifting the automatic stay with regard to Debtor(s)' personal residence.

7. Debtor(s) stand ready to cure all post-petition arrears owed to Respondent(s) and request that this Honorable Court reinstate the automatic stay with regard to Debtor(s)' personal residence.

WHEREFORE, Debtor(s) respectfully requests that the Court enter an Order in the form of the attached proposed Order, reimposing the automatic stay with respect to Debtor(s)' personal residence.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: January 31, 2025

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
PA ID No. 201207
2132 Market Street
Camp Hill, PA 17011
(717) 975-9446
pmurphy@dplglaw.com
Attorney for Debtor(s)

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ORDER OF COURT

UPON CONSIDERATION of the Debtor(s)' Motion to Reinstate Automatic Stay, and good cause having been shown, IT IS ORDERED that the automatic stay with respect to Debtor(s)' personal residence located at 14731 Trout School Road, Felton, York County, Pennsylvania is HEREBY REIMPOSED.

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CERTIFICATE OF SERVICE

I hereby certify that on Friday, January 31, 2025, I served a true and correct copy of the **Debtor(s)' Motion to Reimpose Automatic Stay and proposed Order** in this proceeding via electronic means of USPS First Class Mail upon the recipients as listed in the Mailing Matrix.

/s/ Kathryn S. Greene

Kathryn S. Greene, M-Jur., RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire

Label Matrix for local noticing
0314-1
Case 1:23-bk-02739-HWV
Middle District of Pennsylvania
Harrisburg
Sat Mar 9 15:44:59 EST 2024

Ashley Funding Services, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Credit One Bank
PO Box 98875
Las Vegas, NV 89193-8875

Fortiva
PO Box 105555
Atlanta, GA 30348-5555

(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

Lakeview Loan Servicing LLC
c/o M&T Bank
P.O. Box 840
Buffalo, NY 14240-0840

M&T Bank
Attn: Legal Document Processing
626 Commerce Drive
Amherst, NY 14228-2391

MedStar Medical Group
PO Box 4185967
Boston, MA 02241-8597

Morton & Craig, LLC
110 Marter Avenue, Suite 301
Moorestown, NJ 08057-3125

PRA Receivables Management, LLC
d/b/a Portfolio Recovery Associates
PO Box 41067
Norfolk, VA 23541-1067

(p)ATLAS ACQUISITIONS LCC
492C CEDAR LANE SUITE 442
TEANECK NJ 07666-1713

Chesapeake Urology Associates
PO Box 829922
Philadelphia, PA 19182-1922

First Investor Serv c/o Peritus Portfolio Sv
P.O. Box 141419
Irving, TX 75014-1419

Fox and Fox
1 Montgomery Plaza, Suite 706
Norristown, PA 19401-4852

KML Law Group, PC
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106-1541

Leonardo Girio-Herrera, DO, LLC
c/o Physicians Medical Billing
10845 Philadelphia Road
White Marsh, MD 21162-1717

Maryland Endoscopy Center
PO Box 30250
Nashville, TN 37230-5250

Midland Credit Management, Inc.
8875 Aero Drive, Suite 200
PO Box 939069
San Diego, CA 92193-9069

OneMain Financial
601 NW 2nd Street
PO Box 3251
Evansville, IN 47731-3251

Pennsylvania Department of Revenue
Bankruptcy Division PO Box 280946
Harrisburg PA 17128-0946

U.S. Bankruptcy Court
Sylvia H. Rambo US Courthouse
1501 N. 6th Street
Harrisburg, PA 17102-1104

(p)CONTINENTAL FINANCE COMPANY
PO BOX 3220
BUFFALO NY 14240-3220

First Investors Financial Services
380 Interstate North Parkway #300
Atlanta, GA 30339-2222

Internal Revenue Service
Centralized Insolvency Operation
PO Box 7346
Philadelphia, PA 19101-7346

LVNV Funding, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

M&T BANK
PO Box 1508, Buffalo, NY 14240

MedStar Good Samaritan Physicians
PO Box 417833
Boston, MA 02241-7833

(p)MISSION LANE LLC
PO BOX 105286
ATLANTA GA 30348-5286

PA Department of Revenue
Attn: Bankruptcy Division
PO Box 280496
Harrisburg, PA 17128-0946

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Transworld System, Inc.
PO Box 15618
Wilmington, DE 19850-5618

United States Trustee
US Courthouse
1501 N. 6th St
Harrisburg, PA 17102-1104

University of Maryland
Upper Chesapeake Medical Center
PO Box 418701
Boston, MA 02241-8701

Upper Chesapeake Medical Services
PO Box 418094
Boston, MA 02241-8094

York Adams Tax Bureau
1405 North Duke Street
PO Box 15627
York, PA 17405-0156

(p)JACK N ZAHAROPOULOS
ATTN: CHAPTER 13 TRUSTEE
8125 ADAMS DRIVE SUITE A
HUMMELSTOWN PA 17036-8625

Larry D. Smith Jr.
14731 Trout School Road
Felton, PA 17322-8227

Paul Donald Murphy-Ahles
Dethlefs Pvkosh & Murphy
213 Market Street
Camp Hill, PA 17011-4706

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Atlas Acquisitions LLC
492C Cedar Lane, Ste 442
Teaneck, NJ 07666

(d)Atlas Acquisitions LLC
492C Cedar Lane, Ste 442
Teaneck NJ 07666

Continental Finance Company
4550 Linden Hill Road, Suite 4
Wilmington, DE 19808

Jefferson Capital Systems, LLC
16 Mcleland Road
PO Box 7999
Saint Cloud, MN 56302-9617

Mission Lane
PO Box 105286
Atlanta, GA 30348

Portfolio Recovery Associates, LLC
POB 12914
Norfolk VA 23541

Jack N Zaharopoulos
Standing Chapter 13
(Trustee)
8125 Adams Drive, Suite A
Hummelstown, PA 17036

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)LAKEVIEW LOAN SERVICING, LLC

End of Label Matrix
Mailable recipients 37
Bypassed recipients 1
Total 38